



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 18, 2012

SHERRIANNE STANDLEY, TREASURER  
INDIANA DEMOCRATIC CONGRESSIONAL  
VICTORY COMMITTEE  
115 W. WASHINGTON STREET, SUITE 1165  
INDIANAPOLIS, IN 46204

**Response Due Date**  
**02/22/2012**

IDENTIFICATION NUMBER: C00108613

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2011 - 09/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. On Schedule H2, you disclose the ratio for "Indiana Democratic Editorial Associati" to be "new"; however, Schedule H2 of your Amended August Monthly Report (7/1/11 - 7/31/11), received 9/20/11, disclosed a ratio for this activity/event which is different from the one given in this report. Please amend your report to clarify this discrepancy. (11 CFR §§104.10 and 104.17)
2. The Detailed Summary Page, on Line 18(a) Column A of your Amended August Monthly (7/1/11 - 7/31/11), received 9/20/11, September Monthly (8/1/11 - 8/31/11) and October Monthly (9/1/11 - 9/30/11) Reports combined disclose \$124,076.31 in transfers from the non-federal account for allocated activity in the Administrative category for the reporting period. However, Line 21 (a)(ii) Column A discloses \$99,890.84 as the non-federal share for allocated activity in the Administrative category for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission

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may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

**3.** Schedule H4 discloses an expenditure(s) for "communications consulting services." Please be advised that public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please clarify this activity and amend your report, if necessary, to properly disclose this activity. In addition, please inform the Commission of any corrective action immediately. Although the Commission may take further legal action regarding this apparent prohibited activity, your prompt action will be taken into consideration.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1140.

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Sincerely,

A handwritten signature in black ink, appearing to read "J McAllister". The signature is fluid and cursive, with the first name "J" and last name "McAllister" clearly distinguishable.

James McAllister  
Senior Campaign Finance Analyst  
Reports Analysis Division